<div align="center">**REMARKS/ARGUMENTS**</div>

The Applicants have reviewed the Office Action dated August 24, 2007, and the comments therein were carefully considered. In the Office Action, all pending claims stand rejected. Claims 1, 2, 4-9, 11-15, 17 and 18 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Application No. 2003/0061384 to Nakatani ("Nakatani"). Claims 3, 10 and 16 are rejected under 35 U.S.C. §103(a) as being anticipated by Nakatani in view of U.S. Patent No. 7,058,712 to Vasko et al. ("Vasko"). In addition, claims 9-13 and 15-18 have been objected to for minor informalities, and the Examiner has requested that paragraph 0001 of the disclosure be amended to reflect the current status of related cases.

Amendments to the Specification

The Examiner has requested Applicants to update the status of the related cases. Applicants have amended paragraph 0001 of the specification to reflect the current status of the related cases.

Amendments to the Claims

Applicants have amended claims 6 and 8-18 to correct minor informalities. Applicants respectfully submit that no new matter has been added with the claim amendments.

Claim Rejections - §102(b)

Claims 1, 2, 4-9, 11-15, 17 and 18 stand rejected under Section 102(b) as being anticipated by Nakatani. Applicants respectfully traverse this rejection.

With respect to independent claim 1, Applicant respectfully submits that the cited passages of Nakatani fail to disclose at least the claimed features of "searching for an address configuration server by said first automation device" and "using [an] automation specific protocol."

First, Applicant respectfully submits that Nakatani fails to disclose "searching for an address of a configuration server by said first automation device." The Office Action alleges that Nakatani discloses this feature at paragraphs 0017, 0051 and 0058 in that the industrial automation device (IAD) of Nakatani "broadcast[s] a request for assignment of a dynamic

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network address." While Nakatani generally discloses "[a] system and method of addressing and configuring a remote device," Applicant submits that the cited paragraphs do not disclose that the IAD is searching for an address of a *configuration server*, but instead discloses that address management server (AMS) identifes the IAD on the network, and then the IAD requests the assignment of a dynamic network address for the *IAD* from the AMS. For example, paragraph 0017 of Nakatani states:

> In some embodiments, AMS 130 may identify a device after receiving an identification request transmitted directly from the newly connected device; in accordance with this embodiment, IAD 135 may broadcast a request for assignment of a dynamic network address across network 110. Upon receipt of such a broadcast signal, AMS 130 may identify IAD 135, assign IAD 135 a dynamic network address, and apprise IAD 135 of the assigned address. AMS 130 may additionally apprise host 120 of the network address assigned to a newly identified IAD.

(Nakatani, Paragraph 17). Thus, the cited passage of Nakatani does not disclose that the IAD is "searching for an address of a configuration server," but instead that the IAD is request the assignment of a dynamic network address for the IAD.

In addition, Applicant respectfully submits that Nakatani fails to disclose the use of an "automation specific protocol." The instant application is specific in its description of an "automation specific protocol":

> The network 100 uses an automation specific protocol such as MODBUS, MODBUS/TCP, Devicenet, Profinet, CANOpen, Ethernet/IP, Fieldbus Foundation or other protocol designed specifically for use in automation.

(Application, Paragraph 0017). However, Nakatani only discloses the use of general network protocols. The Office Action cites to the Abstract, and paragraphs 0001 and 0010, of Nakatani, which mention a "dynamic device addressing and configuration protocol," as disclosure for the claimed "automation specific protocol." However, Applicants submit that a "dynamic device addressing and configuration protocol" does not meet the required disclosure. Furthermore, with respect to claim 2, which includes the feature "the automation specific protocol is MODBUS/TCP," the Office Action cites to paragraph 0032 of Nakatani, which again does not disclose "automation specific protocols," much less the "MODBUS/TCP" protocol, but instead discloses networking protocols with a wide variety of applications:

> In one embodiment, the interface between brain module 1200 and data ports 1201-1204 may be integrated, or hard-wired, as represented by a bus 199 in FIG. 2. By way of example, the data connection via bus 199 may be a serial or parallel link. Alternatively,

the data connection may be any type generally known in the art for communicating or transmitting data across a computer network; examples of such networking connections and protocols include, but are not limited to, Transmission Control Protocol/Internet Protocol (TCP/IP), Ethernet, Fiber Distributed Data Interface (FDDI), ARCNET, token bus or token ring networks, Universal Serial Bus (USB), and Institute of Electrical and Electronics Engineers (IEEE) Standard 1394 (typically referred to as "FireWire").

(Nakatani, Paragraph 0032). Thus, Applicants respectfully submit that Nakatani fails to disclose the use of an "automation specific protocol," as seen in claim 1 of the application and throughout the other claims.

For at least the foregoing reasons, Applicants respectfully submit that independent claim 1 is patentable over Nakatani.

With respect to independent claims 8 and 14, Applicants respectfully submit that Nakatani fails to disclose at least the similarly claimed features of "searching for an address configuration server by said first automation device" and "using [an] automation specific protocol," for the same reasons discussed above with respect to independent claim 1. Therefore, Applicants respectfully submit that claims 8 and 14 are also patentable over Nakatani for at least the foregoing reasons.

In addition, because claims 2, 4-7, 9, 11-13, 15, 17 and 18 ultimately depend from allowable claims 1, 8 and 14, Applicants respectfully submits that claims 2, 4-7, 9, 11-13, 15, 17 and 18 are allowable for at least the reasons identified above with respect to claim 1.

Claim Rejections - §103(a)

Claims 3, 10 and 16 are rejected under 35 U.S.C. §103(a) as being anticipated by Nakatani in view of Vasko. Applicants respectfully traverse this rejection. Because claims 3, 10 and 16 ultimately depend from allowable claims 1, 8 and 14, Applicants respectfully submits that claims 3, 10 and 16 are allowable for at least the reasons identified above with respect to claim 1.

CONCLUSION

The Applicant respectfully submits that the instant application is in condition for allowance. Favorable reconsideration of this application is respectfully requested. The Examiner is invited to contact the undersigned should it be deemed necessary to facilitate prosecution of the application.

Respectfully submitted,

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